

Ms. Matthey,

This Comment is in response to a letter granting SBC's request to change the collocation measurement relating to the FCC Merger order.

It is not clear to Logix what information SBC provided the staff but there are a few facts that should be known, in case they were not.

First, SBC agreed to the new Texas collocation PM. This was not a contested measure.

Second, the change in the measure was predicated on SBC change in process. SBC for its own internal purposes has told CLECs not to send the payment with the layout. Instead, CLECs were told to send the layout to one location and to follow-up by sending payment to a different location within a certain number of days. As a result of SBC's change in procedures, the collocation measure was modified.

When the process was changed by SBC, CLECs were assured that the change in process would not in anyway affect the timeliness of SBC providing collocation or the measurements for collocation. Yet, it appears that SBC has now attempted to delay the start time on its collocation measures with the FCC.

If SBC wants to go back to the old process, then CLECs would not oppose altering the SWBT measurement accordingly. However, there should not be any delay in measurement and the provisioning of collocation simply because SBC wants all payments directed to a separate accounting group.

Please contact me with any follow-up information I can provide.

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